

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

VISIBLE SYSTEMS CORPORATION,

Plaintiff

v.

Civil Action No. 04-CV-11610-RGS

UNISYS CORPORATION,

Defendant

DEFENDANT'S PROPOSED *VOIR DIRE* QUESTIONS
IN ADDITION TO THOSE CUSTOMARILY GIVEN
BY THE COURT

Defendant respectfully requests that the Court pose the following questions to potential jurors:

1. Do you have any familiarity with Visible Systems Corporation, a company in Lexington, MA?
2. Have you heard of any of the following software products: Visible Analyst, Visible Developer, Visible Advantage, Polaris, or Razor?
3. Do you have any familiarity with Unisys Corporation, headquartered in Pennsylvania?
4. Have you ever heard or seen the phrase 3D Visible Enterprise?
5. Have you heard or read anything about this case, either in news reports, on the internet, or by word of mouth?
6. This is a case between a small company and a large, multi-national company. All other things being equal, would you tend to favor one of these companies over the other?
7. Have you or anyone you know well had any personal experience with a small company being "taken over" by a large company? If so, might that experience affect your ability to make an unbiased, impartial decision in this case?
8. Do you believe that most large companies are out to quash smaller companies?
9. Have you personally or any family member worked in the technology field or designing or selling software?

10. Have you ever taken any IT (information technology) or IS (information systems) courses?
11. Have you or any close family member been in the military?
12. Do you receive news primarily from newspapers?
13. Do you receive news primarily from television or other electronic media?

Dated: July 13, 2007

UNISYS CORPORATION,
By Its Attorneys,

/s/ William L. Boesch
Anthony M. Doniger, BBO No. 129420
William L. Boesch, BBO No. 558742
SUGARMAN, ROGERS, BARSHAK
& COHEN, P.C.
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CERTIFICATE OF SERVICE

I hereby certify that this document is being filed through the ECF system, and that I am therefore relying on the system to complete service by sending copies of the filing electronically to the necessary counsel, who are registered participants.

/s/ William L. Boesch

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